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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

Dec 08, 2020

SEAN F. McAVOY, CLERK

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BRENDAN TAYLOR HULL,

15 Defendant.

1:20-CR-2048-SMJ  
INDICTMENT

Vio.: 18 U.S.C. § 1951(a),  
Robbery Affecting Commerce

Forfeiture Allegations  
18 U.S.C. § 981,  
18 U.S.C. § 924,  
28 U.S.C. § 2861

16 The Grand Jury charges:

17 1. At all times material to this Indictment, El Mercado Latino II, a business  
18 located at 718 S. 6<sup>th</sup> Street, Yakima, Washington, in the Eastern District of  
19 Washington, and its employees, were engaged in the sale of various types of  
20 merchandise, to include tobacco made and produced outside of Washington and  
21 transported to Washington from outside the State, as well as other items, all bought,  
22 sold, transferred, and offered for sale in interstate and foreign commerce and in an  
23 industry which affects interstate and foreign commerce.

24 2. The term "commerce" is defined in 18 U.S.C. § 1951 as commerce  
25 within the District of Columbia, or any Territory or Possession of the United States;  
26 all commerce between any point in a State, Territory, Possession, or the District of  
27 Columbia and any point outside thereof; all commerce between points within the same  
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1 State through any place outside such State; and, all other commerce over which the  
2 United States has jurisdiction.

3 3. The term "robbery" is defined in 18 U.S.C. § 1951 as the unlawful taking  
4 or obtaining of personal property from the person or in the presence of another,  
5 against his or her will, by means of actual or threatened force, or violence, or fear of  
6 injury, immediate or future, to his or her person or property, or property in his or her  
7 custody or possession, or the person or property of a relative or member of his or her  
8 family or of anyone in his or her company at the time of the taking or obtaining.

9 4. On or about December 1, 2019, in Yakima, Washington, in the Eastern  
10 District of Washington, the Defendant, BRENDAN TAYLOR HULL, did unlawfully  
11 obstruct, delay, and affect, commerce, as that term is defined in 18 U.S.C. § 1951, and  
12 the movement of articles and commodities in such commerce, by robbery, as that term  
13 is defined in 18 U.S.C. § 1951, in that Defendant, BRENDAN TAYLOR HULL, did  
14 knowingly and willfully take and obtain personal property, to wit: U.S. Currency, in  
15 the presence of an employee of El Mercado Latino II, against the employee's will  
16 when the employee had custody of the property, by means of actual and threatened  
17 force, violence, and fear of injury, immediate and future, to the employee's person, to  
18 wit: by the Defendant, BRENDAN TAYLOR HULL, brandishing a firearm and  
19 directing the employee to give the Defendant, BRENDAN TAYLOR HULL, property  
20 of the business to include U.S. Currency, and by the Defendant, BRENDAN  
21 TAYLOR HULL, taking such property, all in violation of 18 U.S.C. § 1951(a).

22 NOTICE OF CRIMINAL FORFEITURE

23 The allegations contained in this Indictment are hereby realleged and  
24 incorporated by reference for the purpose of alleging forfeitures.

25 Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction  
26 of a violation of 18 U.S.C. § 1951(a), as set forth in this Indictment, the Defendant,  
27 BRENDAN TAYLOR HULL, shall forfeit to the United States of America, any  
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1 property, real or personal, which constitutes or is derived from proceeds traceable to  
2 the offense.

3 If any of the property described above, as a result of any act or omission of the  
4 Defendant:

- 5 a. cannot be located upon the exercise of due diligence;  
6 b. has been transferred or sold to, or deposited with, a third party;  
7 c. has been placed beyond the jurisdiction of the court;  
8 d. has been substantially diminished in value; or  
9 e. has been commingled with other property which cannot be divided  
10 without difficulty,

11 the United States of America shall be entitled to forfeiture of substitute property  
12 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

13 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of  
14 an offense in violation of 18 U.S.C. § 1951(a), as set forth in this Indictment, the  
15 Defendant, BRENDAN TAYLOR HULL, shall forfeit to the United States, any  
16 firearms and ammunition involved in the commission of the offense

17 DATED this 8th day of December, 2020.

18 A TRUE BILL

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